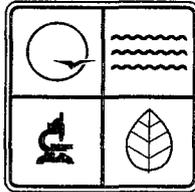


STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI AIR CONSERVATION COMMISSION



PERMIT BOOK

PERMIT TO CONSTRUCT

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to construct the air contaminant source(s) described below, in accordance with the laws, rules and conditions as set forth herein.

Permit Number: **102006-005** Project Number: **2006-08-068**

Owner: **Silgan Containers Manufacturing Corporation**

Owner's Address: **21800 Oxnard Street, Suite 600, Woodland Hills, CA 91367**

Installation Name: **Silgan Containers Manufacturing Corporation**

Installation Address: **305 W. North Street, Mt. Vernon, MO 65712**

Location Information: **Lawrence County, S30, T28N, R26W**

Application for Authority to Construct was made for:

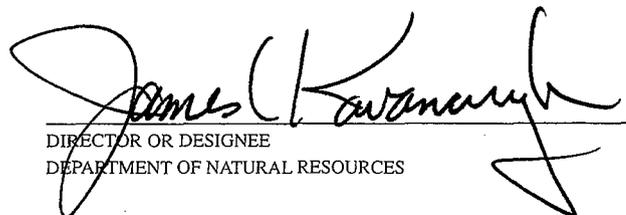
To construct and operate a FBB 5501 Welder on existing can Assembly Line Number 1. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions (listed as attachments starting on page 2) are applicable to this permit.

OCT 10 2006

EFFECTIVE DATE


DIRECTOR OR DESIGNEE
DEPARTMENT OF NATURAL RESOURCES

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional Office responsible for the area within which you are located within 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed Special Conditions as provided in RSMo 643.075. If you choose to appeal, the Air Pollution Control Program must receive your written declaration within 30 days of receipt of this permit.

If you choose not to appeal, this certificate, the project review, your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Department of Natural Resources has established the Outreach and Assistance Center to help in completing future applications or fielding complaints about the permitting process. You are invited to contact them at 1-800-361-4827 or (573) 526-6627, or in writing addressed to Outreach and Assistance Center, P.O. Box 176, Jefferson City, MO 65102-0176.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention Construction Permit Unit.

2006-08-068

Silgan Containers Manufacturing Corporation

21800 Oxnard Street, Suite 600, Woodland Hills, CA 91367

Silgan Containers Manufacturing Corporation

305 W. North Street, Mt. Vernon, MO 65712

Lawrence County, S30, T28N, R26W

To construct and operate a FBB 5501 Welder on existing can Assembly Line Number 1. This review was conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

Page No.	2
Permit No.	
Project No.	2006-08-068

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."

Silgan Containers Manufacturing Corporation
Lawrence County, S30, T28N, R26W

1. Emission Limitation – Volatile Organic Compounds (VOCs)
 - A. Silgan Containers Manufacturing Corporation shall emit less than 250 tons of VOCs from the entire installation in any consecutive 12-month period.
 - B. Silgan Containers Manufacturing Corporation shall not emit Hazardous Air Pollutants (HAPs) in excess of ten (10) tons individually or twenty-five (25) tons combined from the entire installation in any consecutive 12-month period
 - C. Attachment A, Attachment B, and Attachment C or equivalent forms approved by the Air Pollution Control Program shall be used to demonstrate compliance with Special Conditions 1(A) & 1(B). Silgan Containers Manufacturing Corporation shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any Missouri Department of Natural Resources' personnel upon request. These records shall include Material Safety Data Sheets (MSDS) for all materials used in this installation
 - D. Silgan Containers Manufacturing Corporation shall report to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, Missouri 65102, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1(C) indicate that the source exceeds the limitation of Special Conditions Number 1(A) & 1(B).
2. Control Device – Paint Filter
Paint filters must be in use at all times when the spray paint guns are in operation and shall be operated and maintained in accordance with the manufacturer's specifications.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE
SECTION (5) REVIEW

Project Number: 2006-08-068
Installation ID Number: 109-0010
Permit Number:

Silgan Containers Manufacturing Corporation
305 W. North Street
Mt. Vernon, MO 65712

Complete: August 21, 2006
Reviewed: September 15, 2006

Parent Company:
Silgan Containers Manufacturing Corporation
21800 Oxnard Street, Suite 600
Woodland Hills, CA 91367

Lawrence County, S30, T28N, R26W

REVIEW SUMMARY

- Silgan Containers Manufacturing Company has applied for authority to construct and operate a FBB 5501 Welder on existing can Assembly Line Number 1.
- Hazardous Air Pollutant (HAP) emissions are expected from the proposed equipment. HAPs of concern from this process are toluene and xylene. Ethylene glycol monobutyl ether (EGME) and methyl ethyl ketone (MEK) are no longer considered as HAPs as they have been delisted.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- The Maximum Achievable Control Technology (MACT) standard, Subpart KKKK, *National Emission Standards for Hazardous Air Pollutants: Surface Coating of Metal Cans*, does not apply to this installation since this installation is not a major source of HAP.
- Paint filters are used to control particulate matter emissions from the spray painting operation.
- This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC from this project are above de minimus level but below major level. However, Silgan Containers Manufacturing Corporation proposed to take a less than 250 tons per year of VOC emissions cap for the entire installation. Potential emissions of HAPs are conditioned to below major levels (10.0/25.0 tons/year) to be exempt from the requirement of MACT Subpart KKKK.
- This installation is located in Lawrence County, an attainment area for all criteria air pollutants.

- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].
- Ambient air quality modeling was not performed since potential emissions of HAPs are conditioned to below de minimis levels. Furthermore, no Screen3 modeling is currently available which can accurately predict ambient ozone concentrations caused by this installation's VOC emissions.
- Emissions testing is not required for the equipment in this project.
- A revision to the Part 70 Operating Permit is required for this installation within 1 year of equipment startup. Silgan Containers Manufacturing Corporation can submit an Intermediate Operating Permit application if they wish to take a voluntary VOC emission limitation of 100 tons per year.
- Approval of this permit is recommended with special conditions.

INSTALLATION DESCRIPTION

Silgan Containers Manufacturing Corporation (Silgan) operates a food product can manufacturing plant in Mt. Vernon, Missouri. Silgan manufacturers steel three-piece welded cans for subsequent sale to off-site customers for food manufacturing. In the forming of the can, slitters first cut the pre-coated steel sheet to the specific size required for a particular can. The cut plate enters a bodymaker where it is shaped into a cylinder and the seam is resistance welded utilizing a copper wire electrode. A coating is then applied to the inside and/or the outside of the side seam of the can. This side seam stripe is then cured in natural gas fired heat curing ovens. After the can is assembled, assembly lines reduce the diameter of the can. A printed code is then applied via video jet ink marking applicators.

A Part 70 Operating Permit (Permit # OP1999163) was issued to Silgan by the Air Pollution Control Program. The following construction permits have been issued to Silgan from the Air Pollution Control Program.

Permit Number	Description
0390-004	Installation of natural gas curing oven.
1090-001	Installation of welding bodymaker with side seam stripe applicators and a natural gas curing oven.
0295-012	New side seam stripe applicator and curing system.
102001-003	Installation of a FBB5501 Welder and a Videojet Ink Marking system on Can Line 2. The emission sources on Welded Line No. 2 will consist of a side seam stripe applicator, a curing oven, a video jet ink printer and a necker video jet ink printer.
072004-011	Installation of an outside stripe application system on existing can assembly line number one.

PROJECT DESCRIPTION

Silgan proposed to construct and operate a FBB 5501 Welder on existing can Assembly Line Number 1. The new welder will replace the current FBB 5600 Welder. This new welder will increase the weld speed by ten (10) meters per minute thereby increasing line throughput. The following emission points will be involved in this project.

Emission Points	Description
ES-3010	Inside Side Seam Stripe Applicator for Can Assembly Line 1
ES-3011	Natural Gas Fired Curing Oven for Can Assembly Line 1
ES-3012	Videojet Ink Printer for the Seaming Process on Can Assembly Line 1
ES-3013	Cleanup Operations for Can Assembly Line No. 1

Silgan proposed to take an annual facility-wide limitation of less than 250 tons of VOC emission in this application. Silgan also shall keep recordingkeeping of their material usage in the entire installation to ensure the annual emissions do not exceed 25 tons combined HAPs and 10 tons individual HAP.

EMISSIONS/CONTROLS EVALUATION

The emission factors used in the Volatile Organic Compounds (VOCs) and HAP emissions analysis were developed from the Material Safety Data Sheet (MSDS) submitted with the permit application and through the use of the mass balances around the process. PM₁₀ emissions are evaluated based on the solid content of material and transfer efficiency from the spray gun. Paint filters are used to control particulate matter emissions from the spray painting with a control efficiency of at least 90%. The existing actual emissions were estimated from the 2005, Emission Inventory Questionnaire (EIQ). Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). The following table provides an emissions summary for this project.

Table 1: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	Installation Conditioned Potential
PM ₁₀	15.0	N/D	0.02	0.093	N/A
SO _x	40.0	N/D	N/A	0.001	N/A
NO _x	40.0	N/D	0.29	0.17	N/A
VOC	40.0	< 250.0**	21.63	94.01	< 250.0
CO	100.0	N/D	0.24	0.144	N/A
HAPs	10.0/25.0	N/D	N/D	35.31	<10.0/25.0
Toluene	10.0	N/D	N/D	22.85	<10.0
Xylene	10.0	N/D	N/D	12.46	<10.0

N/A = Not Applicable; N/D = Not Determined

** Facility-wide limitation as per Permit Number 072004-011

PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (6) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of VOC from this project are above de minimus level but below major level. However, Silgan Containers Manufacturing Corporation proposed to take a less than 250 tons per year of VOC emissions cap for the entire installation. Potential emissions of HAPs are conditioned to below major levels to be exempt from the requirement of MACT Subpart KKKK.

APPLICABLE REQUIREMENTS

Silgan Containers Manufacturing Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information*, 10 CSR 10-6.110
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required April 1 for the previous year's emissions.
- *Operating Permits*, 10 CSR 10-6.065
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*, 10 CSR 10-6.170
- *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.220
- *Restriction of Emission of Odors*, 10 CSR 10-3.090

SPECIFIC REQUIREMENTS

- *Restriction of Emission of Particulate Matter From Industrial Processes*, 10 CSR 10-6.400

STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (6), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

Fuad Wadud
Environmental Engineer

Date

PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated August 15, 2006, received August 21, 2006, designating Silgan Containers Manufacturing Corporation as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- Material Safety Data Sheet (MSDS) provided by the applicant.
- Southwest Regional Office Site Survey, dated September 6, 2006.

of less than ten (10.0) tons indicates compliance.

Mr. Bill Smith
Plant Manager
Silgan Containers Manufacturing Corporation
P.O. Box 111, 305 W. North Street
Mt. Vernon, MO 65712

RE: New Source Review Permit - Project Number:

Dear Mr. Smith:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit is necessary for continued compliance. The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please do not hesitate to contact me at (573) 751-4817, or you may write to me at the Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale
New Source Review Unit Chief

KBH:fwl

Enclosures

c: Southwest Regional Office
PAMS File: 2006-08-068

Permit Number: